

WDFW SEPA DNS 21-057 Dobson Grass Carp
Comment Period: 12/15/2021 – 12/29/2021

Comment received by PublicInput.com on December 22, 2021, at 2:37 pm:

“It is inconceivable to me that the WDFW would be promoting any program that introduces a non-native species into our local ecosystem during a time of mass extinction and loss of biodiversity, to which invasive and non-native species play a role. I am also concerned because this particular species has caused problems in other areas where it has escaped from ponds during flood events or deliberate placement into streams because those large, hungry fish are known to be tasty to eat and something that recreational fishers enjoy. If someone is having problems controlling weeds around their pond, they need to weed it by hand, or not have a pond. How much more damage do we intend to inflict on our local land? The Grass carp are known to be damaging to native aquatic life because of the amount of vegetation they eat, leading to mortality of native fish species. One need only do a quick google search to pull up articles of the countless problems these fish have created back east. Why are you even considering such a harmful proposal? Please consider the harmful impacts on the benthic community. When you change the make-up of the fish, you impact the small forms of life that exist in sediment that form the base of the food chain. That is a very dangerous thing to alter. Here is what the USDA has to say about grass carp: Direct and indirect impacts via: competition for food; significant changes in the composition of macrophyte, phytoplankton, and invertebrate communities; interference with the reproduction of other fishes; decreases in refugia for other fishes; modification of preferred habitat; predation or competition when plant food is scarce. Has significantly altered the food web and trophic structure of aquatic systems by inducing changes in plant, invertebrate, and fish communities (NAS Database). Why are we even considering something that is so harmful that it is listed as an invasive species by the USDA? You must deny this proposal in full. There is no mitigation for invasive species and this is for a very low priority issue... weeding a pond. We must place what is good for the public above what is enjoyable by one family or one recreational stakeholder. Please follow the science that establishes the harm of allowing these fish to be stocked in a Whatcom County pond.”

From Wendy S. Harris

WDFW Response to Wendy S. Harris:

Thank you for your interest in the proposed introduction of triploid Grass Carp *Ctenopharyngodon idella* into the Dobson private pond in Whatcom County (SEPA# 21057). Stocking of triploid Grass Carp is legal in Washington if individuals follow the procedures and protocols as specified in state law, which require that individuals to apply to the Washington Department of Fish and Wildlife (WDFW) for a fish stocking permit and obtain a Threshold Determination under the State Environmental Policy Act.

Triploid Grass Carp were legalized in 1990 for managing aquatic macrophytes in ponds and lakes where alternative control methods (e.g., mechanical or chemical) are undesirable or unfeasible. Triploid fish are sterile because they have three sets of chromosomes rather than fertile fish that have two sets (i.e., diploid). Fertile Grass Carp are considered invasive species and are prohibited in Washington.

All triploid Grass Carp that are permitted to be stocked in Washington must be certified by the U.S. Fish and Wildlife Service (USFWS) as triploid (sterile), certified by the USFWS as free of aquatic

invasive species and disease, at least 8 inches long, and may only be introduced in lakes or ponds with no or limited connectivity to other waters. Screening is required in situations with limited connectivity. Finally, no more than 24 fish per vegetated acre are permitted to be stocked and applicants must wait at least 5 years between introductions to minimize overgrazing.

No triploid Grass Carp will be permitted for this project until all the requirements have been met.

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